

Gerrit M. Pronske
State Bar No. 16351640
Eric M. Van Horn
State Bar No. 24051465
Jason P. Kathman
State Bar No. 24070036
SPENCER FANE LLP
2200 Ross Avenue, Suite 4800 West
Dallas, TX 75201
(214) 750-3610 – Telephone
(214) 750-3612 – Telecopier
-and-
5700 Granite Parkway, Suite 650
Plano, TX 75024
(972) 324-0300 – Telephone
(972) 324-0301 – Telecopier
Email: gpronske@spencerfane.com
Email: ericvanhorn@spencerfane.com
Email: jkathman@spencerfane.com

**COUNSEL FOR THE PEOPLE OF
THE STATE OF NEW YORK, BY
LETITIA JAMES, ATTORNEY GENERAL
OF THE STATE OF NEW YORK**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:

**NATIONAL RIFLE ASSOCIATION
OF AMERICA and SEA GIRT LLC.**

Debtors¹.

§ CASE NO. 21-30085-hdh-11
§
§
§
§ CHAPTER 11
§
§ Jointly Administered

OBJECTIONS TO DEBTORS' DESIGNATIONS OF DEPOSITIONS AND COUNTER-DESIGNATIONS THERETO

The People of the State of New York, by Letitia James, Attorney General of the State of New York (“NYAG”), a party in interest in the above-referenced bankruptcy case, files these Objections to Debtors’ Designations of Depositions and Counter-Designations Thereto

¹ The last four digits of the Debtors' taxpayer identification numbers are: 6130 (NRA) and 5681 (Sea Girt). The Debtors' mailing address is 11250 Waples Mill Road, Fairfax, Virginia 22030.

(“**Objections and Counter-Designations**”) to the Debtors’ Designation of Deposition Testimony [Docket No. 476] (the “**Debtors’ Designations**”).

GENERAL OBJECTIONS

The NYAG reserves the right to raise objections to testimony as it is read into the record or played live at the hearing in this matter.

To the extent that the Debtors sought or seek to introduce any exhibits through the Debtors’ Designations, the NYAG reserves the right to object if, and when, the Debtors move for the admission of any exhibits into evidence.

The NYAG reserves the right to amend or supplement these objections and counter-designations.

SPECIFIC OBJECTIONS

The NYAG hereby incorporates by reference all objections raised by the NYAG raised on the record of the deposition of William Wang, as Corporate Representative of the NYAG, including all objections based upon the privilege of attorney/client communications, the work-product privilege, and the questions asked being outside or beyond the scope.

[REMAINDER INTENTIONALLY BLANK]

Dated: April 7, 2021.

Respectfully submitted,

Eric M. Van Horn
Gerrit M. Pronkske
State Bar No. 16351640
Eric M. Van Horn
State Bar No. 24051465
Jason P. Kathman
State Bar No. 24070036
SPENCER FANE LLP
2200 Ross Avenue, Suite 4800 West
Dallas, Texas 75201
(214) 750-3610 – Telephone
(214) 750-3612 – Telecopier
-and-
5700 Granite Parkway, Suite 650
Plano, Texas 75024
(972) 324-0300 – Telephone
(972) 324-0301 – Telecopier
Email: gpronske@spencerfane.com
Email: ericvanhorn@spencerfane.com
Email: jkathman@spencerfane.com

– And –

/s/ James Sheehan
James Sheehan
(NY Bar No. 4552055)
Emily Stern
(NY Bar No. 2647220)
Monica Connell
(NY Bar No. 3070943)
Stephen Thompson
(NY Bar No. 5390067)
**OFFICE OF THE ATTORNEY GENERAL
OF THE STATE OF NEW YORK**
28 Liberty Street
New York, NY 10005
(212) 416-8401
Email: James.Sheehan@ag.ny.gov
Email: Emily.Stern@ag.ny.gov
Email: Monica.Connell@ag.ny.gov
Email: Stephen.Thompson@ag.ny.gov

**COUNSEL FOR THE PEOPLE OF
THE STATE OF NEW YORK, BY
LETITIA JAMES, ATTORNEY GENERAL
OF THE STATE OF NEW YORK**

CERTIFICATE OF SERVICE

I hereby certify that on April 7, 2021, a true and correct copy of the foregoing Notice was served upon all parties entitled to notice, including the Debtors, the United States Trustee, and Official Committee of Unsecured Creditors via the Court's electronic transmission facilities.

Eric M. Van Horn
Eric M. Van Horn

<u>Debtor's Designations</u>	<u>NYAG Counter Designations</u>
8:2-6	
9:7-12:23	
13:20-14:14	
16:15-16:19	
16:23-17:02	
17:10-13	
17:18-20	
17:25-18:03	
18:09-19:19	
19:23-25	
20:21-22:25	
23:02-11	
23:15-25:07	
25:12-13	
25:23-28:17	
29:16-20	
30:25-31:3	31: 4-15
32:1-10	
32:22-37:24	
41:6-42:18	
43:1-44:4	
44:19-44:21	
45:14-46:24	
48:8-51:20	
52:11-21	
53:1-6	
53:18-23	53:24 – 54:3
54:4-14	
54:17-25	
55:8-10	
55:16-21	
55:24-57:6	
56:25-57:9	
57:25-58:3	
59:6-12,14	
60:11-61:14	
61:24-63:16	
63:24-64:17	
65:18-66:1	
66:19-69:6	69: 7-12
72:6-14	
73:15-20	
74:2-6	
74:11-76:11	

76:24-77:3	
77:10-25	
78:21-23	78:24 – 79:3
79:3	
79:4-83:9	
84:6-12	
85:1-12	
87:23-89:18	
89:20-22	
91:2-4	
91:19-23	
94:7-15	
99:9-101:10	
101:20-102:5	
104:22-105:24	
106:3-6	
106:9-16	
108:18-24	
112:14-113:11	
121:21-122:15	
124:7-15	
146:4-23	
174:12-20	
175:5-176:10	
178:24-179:6	
180:12-17	
196:8-19	
203:20-205:4	
207:17-208:22	
210:5-15	210:16 – 211:3
210:23-212:3	
211:25-212:16	
212:23-213:8	
214:3-10	
214:11-215:23	
217:8-222:7	
218:8-223:7	
235:14-239:10	233:13-21, 234:12 – 235:13
246:17-247:10	242:19 – 243:8
248:20-249:14	
250:13-254:12	250: 5-10
254:20-256:20	
257:7-259:2	
260:9-260:20	
268:8-271:4	271: 5-10

271:17-272:2	
--------------	--